

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN,)	
)	
Plaintiff,)	CIVIL ACTION
)	
vs.)	NO. 24 C 3299
)	
ESTATE OF JOANN EADS,)	JUDGE MARY M. ROWLAND
MICHELLE CASSADY, MARC EADS,)	
MELISSA EADS, and MICHAEL EADS,)	
)	
Defendants.)	

RENEWED MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiff, by its attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendants, MELISSA EADS, and ESTATE OF JOANN EADS, c/o MELISSA EADS, in the total amount of \$76,170.00, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$30,063.90.

On May 5, 2024, the Summons and Complaint was served on Defendants Melissa Eads and Estate of Joann Eads, c/o Melissa Eads (by tendering a copy of said documents to her personally) at her residence. Therefore, Defendant Melissa Eads and Estate of Joann Eads, c/o Melissa Eads' answers were due on May 28, 2024.

As Defendants, Melissa Eads and Estate of Joann Eads, c/o Melissa Eads, have failed to timely answer the Complaint, Plaintiff respectfully requests entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Carson W. Fallo

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Renewed Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 12th day of May 2025:

Ms. Melissa Eads
2306 Francine Avenue
Joliet, IL 60436-1174

Mr. Marc A. Eads
11216 US Highway 52
Newark, IL 60541-9374

I further certify that on or before the hour of 5:00 p.m. this 12th day of May 2025, I electronically filed the foregoing document (Renewed Motion for Entry of Default and Judgment) with the CM/ECF system, which will send notification to the following CM/ECF participants:

Mr. Thomas C. Cronin
Mr. Sean B. Crotty
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/s/ Carson W. Fallo

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